

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Mark Edward Shaffer And Darlene Rose Shaffer		Chapter 13
	Debtors	17-05173-HWV
Freedom Mortgage Corporation		
	Movants	Answer
	V.	
Mark Edward Shaffer And Darlene Rose Shaffer		
	Respondents	
Charles DeHart.		
	Trustee	

ANSWER

AND NOW, this 14th day of June 2018, the Debtors, Mark Edward Shaffer and Darlene Rose Shaffer, by and through counsel, Dawn M. Cutaia, files this Answer to the Motion for Relief from Stay filed by Freedom Mortgage Corporation, and states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part; Denied in part. Debtors admit they are behind, but they are able to cure the arrears via an amended plan that will include conduit payments.
7. Admitted in part; Denied in part. Debtors admit they are behind, but they are able to cure the arrears via an amended plan that will include conduit payments.
8. Admitted in part; Denied in part. Debtors admit they are behind in their trustee payment, but they full intend to cure those arrears in an amended plan.
9. No response required.

WHEREFORE, the Debtors respectfully requests this Honorable Court dismiss the complaint and/or allow Debtors to cure the default by amending their plan and rolling in the arrears.

Date: June 14, 2018

Respectfully Submitted,

By: **/s/ Dawn M. Cutaia**

Supreme Court ID
77965 Attorney for
Debtors
115 E. Philadelphia St.
York, PA 17401